

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

IRAN NOTICE OF
AMENDMENT

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This document relates to: EVELYN BETSO, et al. v ISLAMIC REPUBLIC OF IRAN,

No. 1:03-mdl-1570.

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 1:21-CV-01394, as permitted and approved by the Court's Order of October 28, 2019, ECF No. 5234. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☐ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- ☒ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	New Plaintiff's Name (alphabetical by last name)	New Plaintiff's State of Residency at Filing (or death)	New Plaintiff's Citizenship/ Nationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent¹	Paragraphs of Complaint Discussing 9/11 Decedent
1	Ballek, Diane	NY	USA	Kevin Czartoryski	Sibling	Appendix 1
2	Betso, Jade	NY	USA	James Betso	Child	Appendix 1
3	Betso, Leah	NY	USA	James Betso	Child	Appendix 1
4	Cohen, Nicholas	NY	USA	Ronald Cohen	Child	Appendix 1
5	Francfort, Amanda C.	NC	USA	Roger C. Steinert	Child	Appendix 1
6	Grande, Anna	NY	USA	Joseph Grande	Spouse	Appendix 1
7	Grande, Christopher	NY	USA	Joseph Grande	Child	Appendix 1
8	Heffernan, Ian	NY	USA	James Heffernan	Child	Appendix 1
9	Heffernan, IV, James	NY	USA	James Heffernan	Child	Appendix 1
10	Heffernan, Lauren	NY	USA	James Heffernan	Child	Appendix 1
11	Mercado, Amber Rae	NY	USA	David Mahmoud	Child	Appendix 1
12	Mercado, Ashley	NY	USA	David Mahmoud	Child	Appendix 1
12	Mercado, Cynthia	NY	USA	David Mahmoud	Child	Appendix 1
13	Motyka, Carol	NY	USA	Kevin Czartoryski	Sibling	Appendix 1
14	Pugliese, Erin Ann	NY	USA	Lawrence J. Sullivan	Child	Appendix 1
15	Quick, Ryan M.	NY	USA	William Quick	Child	Appendix 1
16	Quick, William H.	NY	USA	William Quick	Child	Appendix 1

17	Ragucci, Danielle	NY	USA	Raymond Ragucci	Child	Appendix 1
18	Ragucci, Jeana	NY	USA	Raymond Ragucci	Child	Appendix 1
19	Ragucci, Raymond Jr.	NJ	USA	Raymond Ragucci	Child	Appendix 1
20	Reisman, Michael H.	CA	USA	Steven B. Reisman	Child	Appendix 1
21	Reisman, Natalie R.	NY	USA	Steven B. Reisman	Child	Appendix 1
22	Roth, Alexa A.	TX	USA	Robert M. Roth	Child	Appendix 1
23	Roth, Camryn B.	VA	USA	Robert M. Roth	Child	Appendix 1
24	Roth, Haley R.	VA	USA	Robert M. Roth	Child	Appendix 1
25	Roth, Jonathan Alexander	NC	USA	Robert M. Roth	Sibling	Appendix 1
26	Roth, Jonathan R.	VA	USA	Robert M. Roth	Child	Appendix 1
27	Roth, Joseph Robert	TN	USA	Robert M. Roth	Sibling	Appendix 1
28	Roth, Kyle J.	VA	USA	Robert M. Roth	Child	Appendix 1
29	Roth, Robert Joseph	NC	USA	Robert M. Roth	Parent	Appendix 1
30	Steinert, Evan K.	NJ	USA	Roger C. Steinert	Child	Appendix 1
31	Steinert, Leslie A.	NJ	USA	Rogert C. Steinert	Spouse	Appendix 1
32	Stines, Kristina	NY	USA	James Stines	Child	Appendix 1
33	Sullivan, James Patrick	NY	USA	Lawrence J. Sullivan	Child	Appendix 1
34	Sullivan, Kathleen Mary	NY	USA	Lawrence J. Sullivan	Child	Appendix 1
35	Sullivan, Lawrence John	NY	USA	Lawrence J. Sullivan	Child	Appendix 1
36	Sullivan, Robert William	NY	USA	Lawrence J. Sullivan	Child	Appendix 1
37	Temin Bird, Claire	NJ	USA	Elisabeth Temin	Child	Appendix 1

38	Trapani, Michael	NY	USA	Franco Trapani	Child	Appendix 1
39	Trapani, Nicole	NY	USA	Franco Trapani	Child	Appendix 1

Dated: 9/28/2021

Respectfully submitted,



COUNSEL FOR PLAINTIFFS